

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON, )  
                                )  
Plaintiff,                    )  
                                )  
v.                             ) Case No.: 09-3018-CV-S-RED  
                                )  
                                )  
TEXAS COUNTY, MISSOURI,     )  
MICHAEL R. ANDERSON,        )  
TEXAS COUNTY PROSECUTING    )  
ATTORNEY, and                )  
MICHAEL R. ANDERSON, individually,     )  
                                )  
Defendants.                   )

**DEFENDANT ANDERSON'S AMENDED EXHIBIT LIST**

COMES NOW Defendant Michael Anderson, by and through counsel, and designates the following exhibits which he may use during the cross-examination of Plaintiff's witnesses or during his case in chief:

DEFENDANT'S EXHIBIT NO.	DESCRIPTION OF EXHIBIT
200	Plaintiff's Complaint filed January 21, 2009, excluding exhibits, 20 pages
201	Plaintiff's Second Amended Complaint, excluding exhibits, Defendant's deposition Exhibit 3, 25 pages
202	Monica Daniel Hutchison's application for employment, Defendant's deposition Exhibit 6, 2 pages
203	Texas County Personnel Administration Handbook, Defendant's deposition Exhibit 7, 22 pages

204	January 8, 2005 letter to Hutchison from Anderson, Defendant's deposition Exhibit 9, 2 pages
205	Certified copy of letter from Cynthia MacPherson to Douglas Kinde dated July 7, 2006, including facsimile transmission, 6 pages
206	Plaintiff's Answers to Texas County, Missouri's First Interrogatories Directed to Plaintiff, Defendant's Exhibit 4, 11 pages
207	Plaintiff's Answers to Defendant Anderson's First Interrogatories to Plaintiff, 12 pages
208	Plaintiff's Initial Rule 26(a) Disclosures, 7 pages
209	Plaintiff's Responses to Defendant Anderson's Request for Production of Documents, exclusive of attachments, 4 pages
210	Plaintiff's 2002 Federal and State Income Tax Returns, 8 pages
211	Plaintiff's 2003 Federal and State Income Tax Returns, 9 pages
212	Plaintiff's 2004 Federal and State Income Tax Returns, 10 pages
213	Plaintiff's 2005 Federal and State Income Tax Returns, 16 pages
214	Plaintiff's 2006 Federal and State Income Tax Returns, 16 pages
215	Plaintiff's 2007 Federal and State Income Tax Returns, 6 pages
216	Plaintiff's 2008 Federal and State Income Tax Returns, 22 pages
217	Plaintiff's 2009 Federal and State Income Tax Returns

218	Letter from Anderson to Commissioners dated August 9, 2005, Defendant's deposition Exhibit 10
219	Email from Anderson to Hutchison dated December 20, 2005, Defendant's deposition Exhibit 12, Plaintiff's deposition Exhibit 7, 2 pages
220	Resignation letter of Hutchison dated December 23, 2005, Defendant's deposition Exhibit 13, 1 page
221	Letter of Anderson to County Commission dated December 27, 2005, 1 page
222	Hutchison letter to the EEOC dated February 1, 2006, Defendant's deposition Exhibit 14 <sup>1*</sup>
223	Original letter of Hutchison to EEOC dated February 1, 2006, Defendant's deposition Exhibit 15*
224	Color photograph of Monica Daniel Hutchison, Michael Anderson and Christy Wheeler at college graduation
225	US Department of Justice Civil Rights Division Notice of Right to Sue letter dated October 23, 2008, 1 page*
226	Anderson letter to Harold Emde dated May 16, 2006*
227	Press release from Anderson dated June 6, 2006
228	Thank you card with flower written by Anderson, 2 pages

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<sup>1\*</sup>To be offered only if the court overrules defendant's objections regarding admissibility of evidence in the EEOC investigation.

229 With Special Thanks card and envelope from Carolyn Daniel and Monica Daniel Hutchison to Michael and Diane Anderson, 3 pages

230 Certified copy of court file for Anderson lawsuit against Hutchison and Williams, 21 pages

231 Filing fee check for Anderson lawsuit, 1 page

232 Certified records from Webster University regarding Monica Daniel Hutchison's transcript, 11 pages

233 Webster University 2005 - 2007 graduate studies catalog, excerpt, 7 pages

234 Certified employment records of Monica Daniel Hutchison from ALIVE, 4 pages

235 Certified employment records of Monica Daniel Hutchison from Great Circle, 64 pages

236 Certified employment records of Monica Daniel Hutchison from Missouri Department of Social Services, 51 pages

237 Certified employment records of Monica Daniel Hutchison from Pathways, 153 pages

238 Certified medical records of Monica Daniel Hutchison from Dr. David's Family Clinic, 17 pages

239 Certified medical records of Monica Daniel Hutchison from Dr. Anthony Tay, 10 pages

240 Certified prescription records of Monica Daniel Hutchison from Walgreens, 5 pages

241 Certified prescription records of Monica Daniel Hutchison from Wal-Mart, 7 pages

242 A copy of the Texas County court file regarding adult abuse petition filed by Mildred Williams against Michael Anderson, 12 pages

243 Letter from Anderson to Ted Bruce, Attorney General's office dated January 21, 2006, 2 pages

244 Attorney General forensic analysis report, 6 pages

245 Letter from Anderson to Craig Chavalle, Missouri Attorney General's office including fax cover page, 2 pages

246 Letter to Justin Glick, Missouri Attorney General's office dated January 12, 2006, 1 page

247 A copy of the Prosecuting Attorney's file regarding Danny McNew accident

248 Prosecuting Attorney's file regarding tickets issued to Justin James<sup>2\*\*</sup>

249 Prosecuting Attorney's file regarding tickets issued to Devon James<sup>\*\*</sup>

250 Texas County Commission Agenda dated December 8, 2005, 2 pages

251 Texas County Commission Agenda dated December 13, 2005, 2 pages

252 Texas County Commission Agenda dated December 27, 2005, 2 pages

253 Pay records for Monica Daniel Hutchison from Texas County, 7 pages

254 Employee list from Texas County for 2008 budget redacted showing Christy Wheeler's wage rate history

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<sup>2\*\*</sup>To be offered in the even the court overrules objections to portions of James testimony.

255 Internet posting from news-leader.com dated July 19, 2006 regarding dismissal of lawsuit against Hutchison

256 Email from Monica Daniel Hutchison to Diane Anderson and others dated November 11, 2005 containing joke, 2 pages

257 Anderson notes for meeting with Monica Daniel Hutchison, Defendant's deposition Exhibit 23, 3 pages

258 Monica Daniel Hutchison's sketch of private law office, Defendant's Exhibit 14A

259 Copy of Section 56.085 RSMo

260 Copy of Missouri Rule of Professional Conduct 4-3.1 complete with comments, 1 page

261 Licking Police Department patrol log dated December 17, 2005

262 Investigative subpoena dated December 23, 2005

263 Bankruptcy schedules of Monica Daniel Hutchison, 36 pages

264 Copy of the deposition designations Stephanie Pounds

265 Copy of the deposition designations Dr. Dale Halfaker, MD

266 Copy of the deposition designations Mildred Williams

267 Copy of the deposition designations Monica Daniel Hutchison

268 Copy of the deposition counter-designations  
Harold Emde<sup>3\*\*\*</sup>

269 Copy of the deposition counter-designations  
Seth Walker

270 Copy of the deposition counter-designations  
Dr. David Myers, DO

271 Copy of the deposition counter-designations  
Brad Eidson

272 Copy of the deposition counter-designations  
Brad Ellsworth

273 Copy of the deposition counter-designations  
Debbie James

274 Copy of the deposition counter-designations  
Terry Haden

275 Copy of the deposition counter-designations  
Danny McNew

276 Copy of the deposition counter-designations  
Jeff Kinder

277 Copy of the deposition counter-designations  
Jessica Sparks

278 Letter from Texas County Commission to  
Mildred Williams dated February 3, 2009

279 *Post Traumatic Stress Disorder and Litigation  
Guidelines for Forensic Assessment, 2<sup>nd</sup>  
Edition by Robert I. Simon, MD, 258 pages and  
excerpts therefrom*

280 *Diagnostic and Statistical Manual of Mental  
Disorders, 4<sup>th</sup> Edition, Text Revision and  
excerpts therefrom, 943 pages*

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<sup>3\*\*\*</sup>To be offered only if the court overrules defendant's objections regarding admissibility of evidence in the EEOC investigation.

281	Records of Dina Vitoux through November 17, 2009, 5 pages
282	Repot of Dina Vitoux, Defendant's deposition Exhibit 19, 18 pages <sup>4****</sup>
283	Plaintiff's Deposition Exhibit 50 Terry Haden's drawing of the prosecutor's office
284	List of treatises reviewed by Dr. Dale Halfaker <sup>5</sup> *****
285	Dr. Dale Halfaker's file*****
286	Report of Dr. Dale Halfaker, 66 pages*****
287	CV of Dr. Elizabeth Pribor, 8 pages
288	Report of Dr. Elizabeth Pribor, 33 pages
289	Washington University report of psychological testing prepared by Marcia McCabe, Ph.D., 3 pages
290	MMPI-II answer sheet, 2 pages
291	MCMI-III answers, 4 pages
292	MMPI-II questions, 17 pages
293	MMCI-III interpretive report, 8 pages
294	MMPI-II extended score report, 15 pages
295	Tape recording of Dr. Pribor's interview of Monica Daniel Hutchison
296	Notes of Dr. Elizabeth Pribor, 211 pages

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<sup>4\*\*\*\*</sup>This exhibit is being offered only if the court overrules Defendant's objections to Ms. Vitoux's testimony

<sup>5\*\*\*\*\*</sup>Being offered only in the event the court overrules Defendant's motion to exclude or limit the testimony of Dr. Halfaker.

297 Petition in quo warranto against Jessica Sparks

298 Preliminary Order in quo warranto against Jessica Sparks

299 Cell phone records of Michael Anderson, 1 page

300 W2 and 1099 forms of Monica Daniel Hutchison for the year 2010

301 May 30, 2006 letter from Michael Anderson to Judge Bradford Ellsworth

302 Flask used by Michael Anderson on December 17, 2005

**TAYLOR, STAFFORD, CLITHERO,  
FITZGERALD & HARRIS, LLP**

/s/Warren E. Harris

By \_\_\_\_\_

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**COUNSEL FOR DEFENDANT  
ANDERSON**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 25<sup>th</sup> day of March 2011 the foregoing *Defendant Anderson's Amended Exhibit List* was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel for Plaintiff, David L. Steelman and Corey L. Franklin.

/s/ Warren E. Harris  
Warren E. Harris